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10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13

14 CHRISTOPHER A. NELSON, individually
and on behalf of all others similarly situated,

15 Plaintiff,

16 v.

17 SEAGATE TECHNOLOGY, LLC,

18 Defendant.
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Case No. 5:16-cv-00523-RMW

CLASS ACTION

**STIPULATION FOR EXTENSION OF
TIME TO FILE A RESPONSIVE
PLEADING TO PLAINTIFF'S
COMPLAINT**

Courtroom 6 – 4TH Floor
Hon. Ronald M. Whyte

[Civil Local Rules 5-1(i)(3) and 6-1(a) and
Fed. R. Civ. P. 6(b)(1)(A)]

Complaint Filed: February 1, 2016

1 This Stipulation is entered into by and between Plaintiff Christopher A. Nelson
2 (“Plaintiff”) and Defendant Seagate Technology, LLC (“Defendant”) through their respective
3 counsel of record.

4 **RECITALS**

- 5 1. WHEREAS this action was filed by Plaintiff on February 1, 2016;
6 2. WHEREAS Defendant was served with Plaintiff’s Complaint on February 3, 2016;
7 3. WHEREAS Defendant’s responsive pleading is due on or before February 24,
8 2016;
9 4. WHEREAS the Parties agreed to extend Defendant’s time to respond until April 6,
10 2016;
11 5. WHEREAS, pursuant to Fed. R. Civ. P. 6(b)(1)(A) the Court may, for good cause,
12 extend the time to answer the complaint with or without motion if a request is made before the
13 original time or its extension expires;
14 6. WHEREAS, pursuant to Civil Local Rule 6-1(a), no court order is required;
15 7. WHEREAS, good cause exists for an extension of time to file a responsive
16 pleading as to Plaintiff’s Complaint, because Defendant and its counsel require sufficient time to
17 investigate the facts and law applicable to this putative class action before a responsive pleading is
18 due;
19 8. WHEREAS, the requested time modification will have no effect on the case
20 schedule set by the Clerk’s Notice Resetting Case Management Conference Following
21 Reassignment (ECF No. 12);
22 9. WHEREAS, pursuant to Civil Local Rule 5-1(i)(3), Jeffrey D. Friedman, of Hagens
23 Berman Sobol & Shapiro LLP, Attorneys for Plaintiff, concurs in the filing of this document.

24 **STIPULATION**

25 IT IS HEREBY STIPULATED by and between the parties, through their counsel,
26 that the deadline for Defendant to file a responsive pleading as to Plaintiff’s Complaint is extended
27 to April 6, 2016.
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1 **IT IS SO STIPULATED.**

2
3 Dated: February 23, 2016

4 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

5
6 By /s/ Anna S. McLean
 ANNA S. McLEAN

7
8 Attorneys for Defendant,
9 SEAGATE TECHNOLOGY, LLC

10 Dated: February 23, 2016

11 HAGENS BERMAN SOBOL SHAPIRO LLP

12
13 By /s/ Jeffrey D. Friedman
 JEFFREY D. FRIEDMAN

14
15 Attorneys for Plaintiff,
16 CHRISTOPHER A. NELSON

17 Dated: February 23, 2016

 SHELLER, P.C.

18
19 By /s/ Marc A. Goldich
 MARC A. GOLDICH (*Pro Hac Vice*)

20
21 Attorneys for Plaintiff,
22 CHRISTOPHER A. NELSON